



UMEDIC GROUP BERHAD

[COMPANY NO.: 202101015347 (1415647-D)]

(Incorporated in Malaysia)

WHISTLEBLOWING POLICY

1. INTRODUCTION AND PURPOSE

1.1 All **UMediC** employees are encouraged to raise genuine concerns about any possible improprieties pertaining to financial reporting, compliance, malpractices and unethical business conduct within **UMediC** at the earliest possible time and in an appropriate way.

This Policy aims to instill confidence on and assure our employees that they will be protected from possible reprisals or victimization that if they raise concerns in good faith, and believing them to be true.

2. SCOPE AND GENERAL PRINCIPLES

2.1 The scope of matters covered by this Policy not only relates to concerns and complaints regarding financial matters but also the following (not exhaustive): -

- a. financial malpractice, impropriety or fraud;
- b. corruption, bribery or blackmail;
- c. failure to comply with laws or regulations or group/company policies and procedures;
- d. criminal offences and miscarriage of justice;
- e. endangerment of an individual's health and safety;
- f. falsification or destruction of business or financial records, or misrepresentation or suppression of financial information; or
- g. concealment of any or a combination of the above.

2.2 The general principles underpinning this Policy are as follows: -

- a. all concerns raised will be treated fairly and properly.
- b. the Board will not tolerate harassment or victimization of anyone raising a genuine concern.
- c. the Board will ensure no Whistleblower will be at risk of suffering some form of reprisal as a result of raising a concern even if he is mistaken. The Board, however, does not extend this assurance to someone who maliciously raises a matter he knows is untrue or is acting for personal gain.
- d. the submission of a false or frivolous report may have consequences for Whistleblower and he may be liable for damages towards anyone who suffered from such false report. However, in the event that a complaint made in good faith is subsequently found to be untrue, no action would be initiated against the Whistleblower.
- e. the act of whistleblowing should not shield Whistleblower from the reasonable consequences flowing from any involvement in improper conduct. The Whistleblower's

liability for his own conduct is not affected by his disclosure of that conduct. However, in some circumstances, an admission may be a mitigating factor when considering disciplinary or other action.

3. WHISTLEBLOWING PROCEDURES

3.1 If any employee believes reasonably and in good faith that suspected incident of improper conduct or malpractice exists within the Group, the employee should report this immediately to his immediate superior or management in writing and specifying: -

- a. the Whistleblower's full name and contact details;
- b. the background, date and history of the concerns;
- c. the reasons for the concerns;
- d. details of witnesses and all factual corroborating evidence as is available;
- e. whether the Whistleblower has any personal interest in the matter;
- f. whether action has already been taken by anyone.

If the superior initially alerted is not competent to deal with the complaint, he should escalate, in strictest confidence, the relevant information and documents to higher management and inform the Whistleblower accordingly.

3.2 The management who receives the complaint shall maintain all complaints received, tracking their receipt, investigation and resolution. Each report shall be screened to assess its reliability and whether there is sufficient information to warrant an investigation.

3.3 The management may decide not to investigate a complaint if in its opinion the complaint: -

- a. Is trivial; or
- b. Is frivolous or vexatious; or
- c. if the Whistleblower has had knowledge for more than 12 months of the disclosed matter and failed to give a satisfactory explanation for the delay in making the disclosure.

Should the management determine that a Whistleblower's report warrants an investigation, he or such other officer as may be identified will conduct an investigation with complete independence and confidentiality, in the shortest possible time given the resources are available.

3.4 The following principles shall be applied during investigations: -

- a. confidentiality of information and communications must be maintained.
- b. issues must be addressed promptly.

- c. the investigation must locate and assess all evidence that either substantiates or refutes the complaint.
 - d. decisions should be made only on the basis of relevant evidence that is available.
 - e. all actions and the conduct of the investigation must be unbiased and must not draw conclusions until all the evidence has been collated and reviewed.
 - f. individuals who are suspected of having been involved with improper conduct should be informed of the issue as soon as practicable and be given the opportunity to provide explanations, details and responses to any allegations.
- 3.5 The Whistleblower will be informed of who is handling the matter, how he can make contact with the investigator and whether there is any further assistance required. The Whistleblower will receive update on the progress of the investigation and its outcome, unless this would be detrimental to the Whistleblower or the investigation, or unless there are other reasons not to inform the Whistleblower (such as the infringement of a duty of confidentiality owed by the Group to another party).
- 3.6 The investigator will be responsible for safeguarding all information received from a Whistleblower. The knowing unauthorised disclosure of Whistleblower's information or the identity of a Whistleblower by any employee may constitute misconduct for which, if established, disciplinary measures may be imposed.
- 3.7 The person who is being investigated by the Company shall: -
- a. be informed as to the substance of the allegations at the outset of an investigation;
 - b. be given the opportunity to respond to the allegations or material points of evidence contained in the investigation report, unless there are compelling reasons to the contrary;
 - c. be informed as to the substance of any adverse comment that may be included in any report arising from the investigation;
 - d. have his defence set out fairly in any report; and
 - e. be informed of the outcome of the investigation.
- 3.8 The Whistleblower may make a report to the Audit and Risk Management Committee directly if: -
- a. the above channels have been followed and the Whistleblower still has concerns;
 - b. no action has been taken by the person initially alerted and all alternatives for internal consultation have been exhausted; or
 - c. the use of the above reporting procedures is not appropriate in view of the circumstances or nature of the incidents (for instance, if there is a conflict of interest or a risk of reprisals, the intended recipient of the complaint is personally implicated in the incidents to be reported).

- 3.9 The Audit and Risk Management Committee may appoint an independent (internal or external) investigative officer at the expense of the Company to investigate and report to the Audit and Risk Management Committee: -
- a. The allegation;
 - b. All documents, statements or other exhibits received, and where any evidence has been rejected as being unreliable, the reasons for this opinion being formed;
 - c. The conclusions reached and the basis for them;
 - d. Any recommendations arising from the investigation; and
 - e. Steps that need to be taken by the Group to prevent a recurrence in the future.
- 3.10 It should be noted that cases relating to suspected criminal activity, including but not limited to fraud, may be referred to the police at any stage of the investigation and will then be investigated by an external investigator.
- 3.11 All employees, directors and officers must fully co-operate with any investigation initiated under this Policy.
- 3.12 All employees, directors and officers must refrain from any activity that is, or could be perceived to be, victimisation or harassment of a Whistleblower making a complaint in good faith. Any effort to retaliate against such Whistleblower will be reported immediately to the Audit and Risk Management Committee and appropriate disciplinary action taken.
- 3.13 Any attempt to cover up wrongdoing is a disciplinary offence. If the Whistleblower is told not to raise or pursue a complaint, even by a person in authority, he should report the matter to the Audit and Risk Management Committee.
- 3.14 Upon completion of an investigation, all documentation pertaining to the complaint including but not restricted to the investigation report, corrective action taken and evidence shall be maintained by the Human Resource Department.

4. CONFIDENTIALITY

- 4.1 All complaints received will be kept confidential and will be shared only on a 'need to know' basis.
- 4.2 The identity of a Whistleblower will not be disclosed without his prior consent. Where concerns cannot be resolved without revealing the identity of the Whistleblower (i.e., if the evidence is required in court), a dialogue will be carried out with the Whistleblower as to whether and how the matter can be pursued.